

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**AMANDA DEL TORO, DANIEL
WERNER, JENNIFER MCGREGOR-
HALSTEAD, JOSHUA CHROMICK
AND ALL OTHERS SIMILARLY
SITUATED,**

Plaintiffs,

v.

**CENTENE MANAGEMENT
COMPANY, LLC**

Defendant.

Civil Action No. 4:19-cv-02635-JAR

CONSENT MOTION FOR EXTENSION OF TIME

Defendant Centene Management Company, LLC (“Centene”), by and through its counsel, and with the consent of Plaintiffs Amanda Del Toro, Daniel Werner, Jennifer McGregor-Halstead, and Joshua Chromick (collectively, “Plaintiffs”), respectfully submit this Consent Motion for Extension of Time for Centene to respond to Plaintiffs’ Complaint (the “Complaint”), filed on September 25, 2019. In support of this Motion, Centene states as follows:

1. Plaintiffs filed the Complaint in the above-captioned adversary proceeding on September 25, 2019.
2. Centene’s response to the Complaint is currently due on October 17, 2019.
3. Counsel for the parties conferred about the scope of the Complaint and based on the parties’ discussions Plaintiffs will file an Amended Complaint by October 31, 2019. Plaintiffs have agreed not to oppose a request to extend the period of time for Centene to answer or otherwise respond to 30 days after the date Plaintiffs file their Amended Complaint.

4. Centene respectfully requests additional time, through and including November 30, 2019 to submit its response to Plaintiffs' Complaint.

5. This request for an extension of time is not made for the purpose of delay and will not result in prejudice to any party.

6. Counsel for Centene has consulted with counsel for Plaintiffs regarding the request, and Plaintiffs' counsel has consented to the request set forth in this Motion.

WHEREFORE, Centene respectfully requests that this Court extend Centene's time to answer or respond to Plaintiffs' Complaint to November 30, 2019 or grant such further relief as this Court deems proper and just.

October 15, 2019

Respectfully Submitted,

s/ Patricia J. Martin
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Attorneys for Defendant
**CENTENE MANAGEMENT
COMPANY, LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 15th day of October, 2019, a true and correct copy of the above and foregoing Consent Motion for Extension of Time was electronically filed with the court using the CM/ECF system, which sent notification to all parties in interest participating in the CM/ECF.

/s/ Patricia J. Martin
PATRICIA J. MARTIN